

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	KEVIN S. JONES and	: CHAPTER 13
	LINDA L. JONES,	:
	Debtors	:
	CHARLES J. DEHART, III.	:
	STANDING CHAPTER 13 TRUSTEE	:
	Movant	:
	VS.	: CASE NO: 4-17-bk-03221-JJT
	KEVIN S. JONES AND	:
	LINDA L. JONES,	:
	Respondents	:

DEBTORS' ANSWER TO TRUSTEE'S OBJECTIONS TO CHAPTER 13 PLAN

AND NOW, comes the Debtors, Kevin S. Jones and Linda L. Jones, husband and wife, Respondents, and answer Trustee's Objection as follows:

1. The Debtors have not violated 11 U.S.C. Sec. 1322(a)(1) as they have submitted all their disposable income to the Trustee. The Trustee is stating that the Debtors must submit their entire earnings for 2017 but the rules only require submission of six months, and this is the basis upon which the Debtors filed their plan. Prior to that six months, one of the Debtors had additional income due to substantial overtime that is not now available to him.
  - a. With respect to Subparagraph a, the Debtors are amending their Means Test calculation removing any reference to a stripped mortgage and replacing it with the amount of \$883.90. Furthermore, it is answered that the Debtors never actually listed a stripped mortgage but the amount of the mortgage payment was slightly off and is being amended.
  - b. Lines 34, 35, 36 and 45 are being amended to the extent necessary, if any.

2. With respect to the real estate valuation, this is being amended to use the assessed value times the current common level ratio for Lycoming County real estate of 1.32 to increase it to \$87,120 and to amend the exemption showing the amount to be \$13,667.30.
3. The Debtors will supply the paystub as requested for the month ending December 31, 2017.

WHEREFORE, Debtors allege and aver that the plan is confirmable and pray that this Court will approve the Debtors' plan, dismiss the Objections and provide other relief as may be necessary.

Respectfully Submitted,



Scott A. Williams, Esquire  
I.D. #07576  
Attorney for Debtors  
57 East Fourth Street, PO Box 3  
Williamsport, PA 17703  
(570) 323-8568

## CERTIFICATE OF SERVICE

AND NOW, this 21<sup>st</sup> day of December 2017, I hereby certify that I have served the within Answer by electronically notifying parties and also by depositing a true and correct copy of the same in the U.S. Mail at Williamsport, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036



Scott A. Williams, Esquire  
I.D. #07576  
Attorney for Debtors  
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